

Cummings & Lockwood, LLC
Attorneys For Defendant Chevron U.S.A. Inc.
John W. Cannavino (JC - 7076)
Steven I. Frenkel (SF - 8187)
Kevin P. Broughel (KB - 7482)
6 Landmark Square
Stamford, CT 06901
(203) 327-1700

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AMERICAN STEAMSHIP OWNERS : No. 04 -cv- 04309 (LAK)
MUTUAL PROTECTION AND :
INDEMNITY ASSOCIATION, INC. :
:
Plaintiff, : AFFIDAVIT OF
:
-against- : CHRISTOPHER B. CONLEY
:
:
ALCOA STEAMSHIP CO., INC., et al., :
:
Defendants. :
:
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STATE OF CALIFORNIA)
) SS.: San Ramon
)
COUNTY OF CONTRA COSTA)

The undersigned, Christopher B. Conley, being duly sworn according to law, hereby deposes and says that:

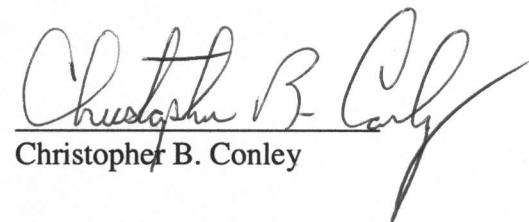
1. I am over the age of eighteen (18) years and I am duly competent to make this affidavit which was prepared with the assistance and advice of counsel.

2. I submit this affidavit on behalf of Chevron U.S.A. Inc., a defendant in the above-captioned action. I am familiar with the facts stated herein, which are based on my personal knowledge and/or review of documents.
3. I have been employed as a Staff Financial Analyst in the Treasury Department of Chevron Corporation (“Chevron”) since 1985.
4. Chevron U.S.A. Inc. is an affiliated company of Chevron.
5. California Oil Company (“California Oil”) was incorporated in November, 1945. California Oil was commonly known as “CALOIL” or “CALSO.” In 1958, this brand name was changed to “Chevron” and then in 1965, the company name was changed to Chevron Oil Company - Eastern Division. In 1977, Chevron Oil Company - Eastern Division became part of Chevron U.S.A. Inc.
6. As a Staff Financial Analyst in the Treasury Department of Chevron, my duties and responsibilities have included and continue to include the review and analysis of marine insurance policies and related policy coverage for Chevron and its affiliated companies including, but not limited to, Chevron U.S.A. Inc.
7. Documents produced in this litigation by the American Steamship Owners Mutual Protection and Indemnity Association, Inc. (the “American Club”) reveal that California Oil purportedly had coverage with the American Club during the years of 1947 to 1951 for only 3 vessels; the Fort Mims, Kettle Creek and Rock Landing. A fourth vessel, the Clark’s Wharf, was purportedly insured by the American Club in 1951.
8. Documents produced by the American Club in this litigation show that the years in question (1947-1951) were “closed” by the American Club by 1955.

9. I have completed a thorough search and investigation regarding California Oil as an alleged member of the American Club. I was also assisted in this search by Chevron records management personnel. I can state with certainty that:

- a) There is no record of California Oil ever having a representative on the American Club board;
- b) There is no record of any asbestos or other occupational disease claim(s) being submitted to the American Club by California Oil; and
- c) I have not located any record of any reimbursement and/or payment as a result of a submitted asbestos, or other occupational disease claim(s) by the American Club to California Oil at any time.

10. Prior to this litigation, it was not known that California Oil had insurance coverage with the American Club. It would be inequitable at this time for the American Club to assess California Oil a premium for the alleged coverage years at issue.



Christopher B. Conley
Christopher B. Conley

Subscribed and sworn to before me this

_____ day of June, 2006

Notary Public
my commission expires: _____

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California Jurat Loose Certificate

State of California
County of Contra Costa } ss.

Subscribed to and sworn to (or affirmed) before me

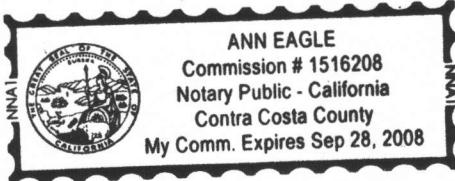
this 6th day of June, 2006 by

Christopher B. Conley,

personally known to me or proved to me on the

basis of satisfactory evidence to be the person(s)

who appeared before me.



by le
Signature of Notary

Other Information

This information is not required by state law, but is helpful in preventing fraud.

Document Identification:

Name/Type: Affidavit of Christopher B. Conley

Date: June 6, 2006 # of Pages: 3

Other Info: American Steamship Owners Mutual Protection and Indemnity Assoc.

Journal Entry #: _____ against Alcoa Steamship Co., Inc. et al Inc.

Signer Information

Name: Christopher B. Conley

Capacity (if corporate): Staff Financial Analyst